

# **npi** NISHNA PRODUCTIONS, INC.

"Providing support and opportunity in the community for people to choose and achieve their personal goals"

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January 27, 2005

Committee for Purchase  
From People Who Are  
Blind or Severely Disabled  
Jefferson Plaza 2, Suite 10800  
1421 Jefferson Davis Highway  
Arlington, Virginia 22202-3259

To Whom It May Concern:

Nishna Productions, Inc. is a Community Rehabilitation Program that serves people with disabilities in Southwest Iowa. As an agency, we serve people both vocationally and residentially.

A component of our vocational program is the government contract that we manage in Council Bluffs for the General Services Administration. In this program, we provide custodial services to the Federal Building and Post Office in Council Bluffs. We employ fifteen people with disabilities, who complete the custodial tasks in these buildings.

We have concerns about these proposed rules, and would request your assistance in "halting" their implementation. We would ask that the rulemaking process be delayed until there has been a complete review of the issues raised by the proposed rules. We urge you to contact the JWOD Committee and the Office of Management and Budget to delay implementation of the proposed rules until all its consequences can be determined.

Nishna Productions, Inc. is a small agency in rural Southwest Iowa. As a result, we have concerns related to the proposed rules about the Board of Directors. Please understand that NPI operates with a small Board of Directors, all of whom volunteer their time, and that Board Member recruitment is not an easy thing to do. Our concerns are as follows:

- 1) The rules call for an "Audit Committee" that oversees the financial affairs. A definition of "Audit Committee" is not provided. The agency has an annual independent audit, but it is not clear if this would suffice.

- 2) The rules call for "Board Membership" to turn over on a recurring schedule. Recurring schedule is also not defined, but we want you to know that Board member recruitment is not an easy task to accomplish.
- 3) The rules require minutes of the Board to be published. We do not currently do this for two reasons: a) NPI is a private, non-profit 501(c)3; and b) Publishing meeting minutes costs money. Will these additional costs be reimbursed by the federal government?
- 4) The rules call for at least one financial expert as a Board Member. Again, there is not a definition offered for financial expert. Volunteer boards do not always have easy access to financial experts to serve on a Board of Directors.

The proposed rules have a lot to say about executive compensation packages. Even though this is not an issue that would be of a concern to our agency, we would ask that this area also be analyzed. CRP executives must possess an unusual set of skills, and there are a limited number of people who can perform these functions. These skills include, but are not limited, to (i) the knowledge of government contracting, finance, manufacturing and general business skills; (ii) a thorough understanding of social services; and (iii) professional experience with employing severely disabled workers.

Thank you in advance for your assistance and cooperation. Feel free to contact me at (712) 623-4362 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Sherri Clark", with a stylized, cursive script.

Sherri Clark  
Executive Director